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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,) No. 15-CR-416 WHA
Plaintiff,)
v.) STIPULATION TO EXCLUDE TIME
CLAUDIO MACIEL,) UNDER THE SPEEDY TRIAL ACT;
Defendant.) [PROPOSED] ORDER

STIPULATION

The United States of America, by and through Special Assistant United States Attorney Philip Kopczynski, and Defendant Claudio Maciel, by and through his attorney John Forsyth, hereby stipulate that, with the Court's approval, the time between September 8, 2015 and September 22, 2015 is excludable under the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), for effective preparation by defense counsel. Defense counsel will use the excluded time to review the discovery

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STIP. TO EXCLUDE TIME; PROPOSED ORDER
NO. 15-CR-416 WHA

1 produced by the government.

2 IT IS SO STIPULATED.

3 Dated: September 17, 2015

_____/s/_____

4 PHILIP KOPCZYNSKI
Special Assistant United States Attorney

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6 Dated: September 17, 2015

_____/s/_____

7 JOHN D. FORSYTH
Attorney for Defendant

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STIP. TO EXCLUDE TIME; PROPOSED ORDER
NO. 15-CR-416 WHA

1 **[PROPOSED] ORDER**

2 GOOD CAUSE APPEARING, upon stipulation of the parties,

3 THE COURT FINDS that failing to exclude the time between September 8, 2015 and September
4 22, 2015 would unreasonably deny defense counsel the reasonable time necessary for effective
5 preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

6 THE COURT FURTHER FINDS that the ends of justice served by excluding the time between
7 September 8, 2015 and September 22, 2015 from computation under the Speedy Trial Act outweigh the
8 interests of the public and the defendant in a speedy trial.

9 THEREFORE, IT IS HEREBY ORDERED that the time between September 8, 2015 and
10 September 22, 2015 shall be excluded from computation under the Speedy Trial Act.

11 IT IS SO ORDERED.

12 Dated: September 18, 2015


HON. WILLIAM ALSUP
United States District Judge